

IN THE UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

MR. JEFFERY ALONZO SIMMS #198625

(plaintiff)

V.

(DEFENDANTS)

ORIGINAL

CIVIL ACTION NO. 04-941-SLR

AND CIVIL ACTION NO. 04-1205-SLR

DATE JULY 19-2005

I.D. 198625

R.L. HUGHES RET. MAJOR, LT. COL. NOW MAJOR
 THOMAS F. MACLEISH, COL. L. AARON CHAFFINCH
 (DELAWARE STATE POLICE 1441 N. DUPONT
 HWY. DOVER, DELAWARE 19901

MR. RALPH K. DURSTEIN 111

DEPARTMENT OF JUSTICE 820 N. FRENCH
 STREET 6th FLOOR WILMINGTON, DELAWARE
 19801

(DEFENDANTS)

HARRY M. FREEMAN M.D. PH. d, ORTHOPEDIC
 SURGEON 808 MIDDLEFORD ROAD
 SEAFORD, DELAWARE 19973.

DOCTOR DONNA BURS BURNS P.H.d, M.D.

(WORK PLACE) SUSSEX CORRECTIONAL

INSTITUTION P.O. BOX 500

GEORGETOWN, DELAWARE 19947.

(RET. MAJOR R.L. HUGHES DEL STATE POLICE)

WILSON V. SEITER, 501 U.S. 294

, 111 S. CT. 2321, 115 L. ED

. 2d 271 (1991)

HELLING V. MCKINNEY, 509 U.S.

25, 113 S. CT. 2475, 125 L. ED.

@d 2d 22 (1993) : LAAMAN V.

HELGEMOE, 437 F. SUPP. 269,

312 (D.N.H. 1977)

FILED

JUL 25 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

NOTICE OF MOTION

PLEASE TAKE NOTICE OF THE ENCLOSED MOTION FOR EMERGENCY RELIEF

WHILE IN A STATE INSTITUTION OF CORRECTION IN THE STATE OF DELAWARE
 WITH A STATEMENT OF CLAIMS AND CERTIFICATE OF SERVICE HERETO: WILL
 BE PRESENTED TO THIS HONORABLE COURT AT THE EARLIEST URGENT POSSIBLE
 DATE.

FOURTEENTH AMENDMENT :

UNDER FEDERAL OF THE UNITED STATES OF AMERICA:

1. a) COMMISSION ON ACCREDITATION FOR CORRECTION,
 CERTIFICATION STANDARDS FOR HEALTH CARE PROGRAMS HC -058(1989).

2. B) UNITED STATES DEPT OF JUSTICE, FEDERAL STANDARDS FOR CRIMINAL
 JUSTICE §§ 23.5 -1, 5-2 (1986_): (FOR PRISON AND JAILS §§ 5.22-24)
 (1980)

CORRECTIONAL HEALTH CARE, ABA STANDARDS FOR CRIMINAL JUSTICE
 J -20-21(1987), NATIONAL COMMISSION ON CORRECTIONAL HEALTH CARE,
 STANDARDS FOR HEALTH SERVICES IN JAILS J-44(MAY1999)



IM JEFFREY A SIMMS

SBI# 192625 UNIT A-D-3 east

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



Honorable Judge Sue h. Roberson

United States District Court

244 N. King Street, Room 18 Box

Honorable Judge Thomas H. Ambrose Building

Federal Building Wilmington Delaware

19801-3570

19801/3570

